

Idaho Public Utilities Commission

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C.L. Butch Otter, Governor

Paul Kjellander, Commissioner Kristine Raper, Commissioner Eric Anderson, Commissioner

August 4, 2016

Tom Wheeler, FCC Chairman Federal Communications Commission 445 12th Street SW Washington, D.C. 205584

RE: WC Docket No. 16-143, Business Data Services in an Internet Protocol Environment; WC Docket No. 15-247, Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans; WC Docket No. 05-25, Special Access for Price Cap Local Exchange Carriers; RM-10593, AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services.

Dear Chairman Wheeler:

Thank you for your continuing efforts to improve both wireline and wireless broadband access in rural America and to promote competitive broadband markets. Today, we write to emphasize the importance of ensuring that if a final rule in the Commission's Further Notice of Proposed Rulemaking (FNPRM) on business data services is adopted, that it is based on accurate industry data and promotes strong continued investment in broadband infrastructure.

We appreciate the Commission's goal – to encourage telecommunications providers to build and invest in networks while enhancing competition among various providers of business data services. As you work toward a final rule, it is imperative for the Commission to use all available data for rural states such as ours. Moreover, the Commission must also use current and accurate information that includes the data submitted earlier this year by the major cable operators. This will ensure that competitive markets are accurately reflected and that the regulations for noncompetitive markets are based on the real cost to provide service. Rural communities depend on robust investments in business data services to connect small businesses and anchor institutions, support wireless data service, and enable economic development. Without these investments, our rural customers will face significant challenges in accessing the 21st century global economy.

We strongly believe that good decisions can only be made with good information and accurate data. Thank you for your consideration.

Sincerely,

Paul Kjellander, President

Idaho Public Utilities Commission

Kris Raper, Commissioner Idaho Public Utilities Commission

Eric Anderson, Commissioner

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